

Ex Parte July 22, 2013

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

RE: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive

Auctions, GN Docket No. 12-268

RE: In the Matter of Promoting Interoperability in the 700 MHz Commercial Spectrum, WT

Docket No. 12-69

Dear Ms. Dortch:

On Thursday, July 18, 2013, James Warden, Paul Frew, David Steer, and Müge Ayşe (Aya) Kiy of BlackBerry Corporation met with David Goldman and Alex Hoehn-Saric of Commissioner Rosenworcel's office. In addition, on July 19, 2013, the same BlackBerry representatives and Chris Parandian of Tin Can Communications met with Courtney Reinhard of Commissioner Pai's office. The discussion in these meetings focused on the topics set forth in the attached slide presentation.

During the meetings, we discussed the practicalities around the technical implementation of the proposed band plans. Consistent with our comments and our response to the Commission's May 17th Public Notice, we reiterated our support for the Commission's "Down from 51" approach and our concerns about the number of sub-bands in the plan.

We also discussed the technical constraints presented by antenna design and filter requirements, including size and performance constraints. BlackBerry emphasized that it is important for the Commission to recognize the limitations of technology in designing a path forward to achieving our shared objectives of maximizing spectrum, increasing flexibility, and creating an environment that supports ubiquitous and sustainable mobile handsets. As well, we repeated our support for an internationally harmonized band as the best way to achieve a competitive and healthy handset ecosystem.

Finally, in our meeting with David Goldman and Alex Hoehn-Saric, we discussed the inevitable tradeoffs between the objectives the Commission has set forth in its 700 MHz proceeding. We expressed that, to the extent possible, the Commission should consider addressing the technical challenges manufacturers face in developing handsets for the 700 MHz band such as the high power broadcasts in Channel 51. Such a holistic approach that includes a long term plan to align bands and their technical characteristics will maximize the opportunity for interoperability.

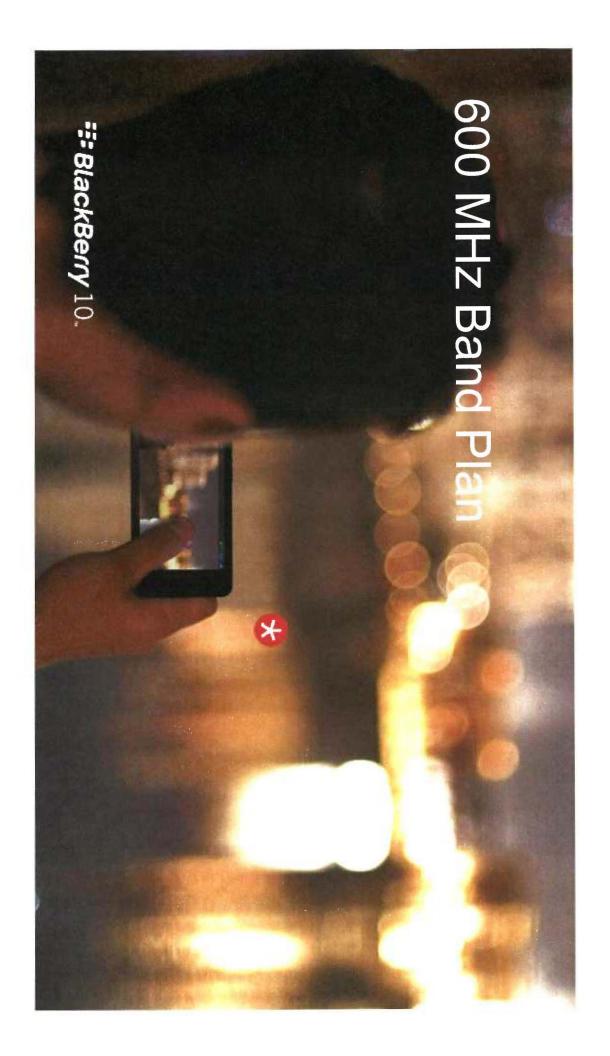
Mijge Avse (Ava) Kiv

*** BlackBerry

Attachment

cc: David Goldman

Alex Hoehn-Saric Courtney Reinhard



Contents

- A band plan for 600 MHz
- Antenna design
- Filter requirements
- Harmonization



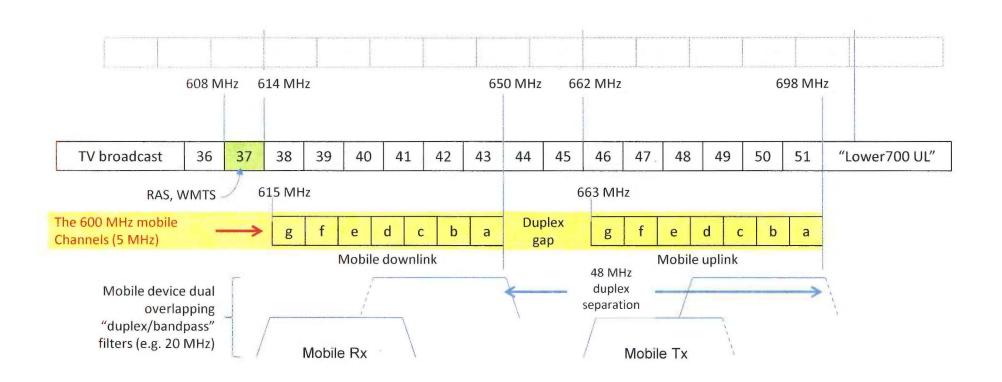


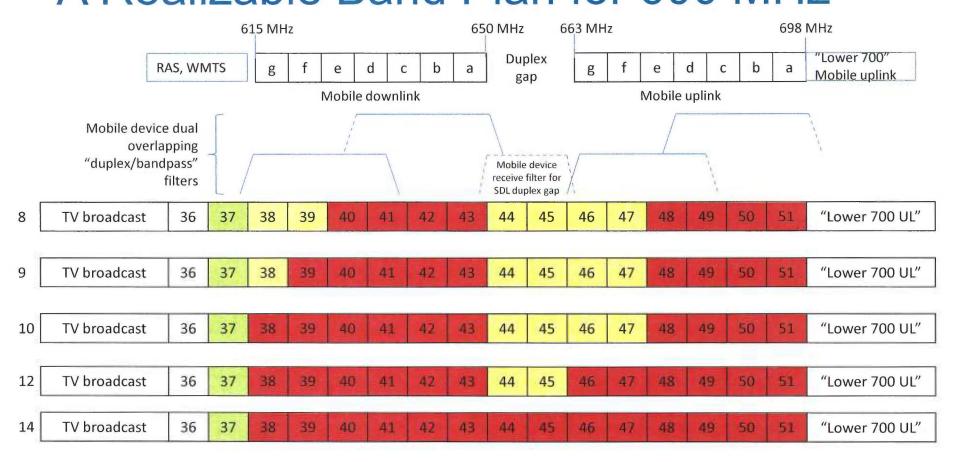
A Realizable Band Plan for 600 MHz

Balance among practical technical limitations

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Alignment uplink and downlink aligned with adjacent services
              → minimize "guard bands" & interference
Antenna
            ~10% bandwidth
     614-698 is 13% (84/656)
                                  → developing technology dynamic antenna tuning
                                  →low efficiency - significant loss
     efficiency
Filters
           ~4% bandwidth (25/656)
     space for only one set (large chip at 600 MHz band)
     dual overlapping duplex filters
         → developing technology for APT 700 MHz band plan
Signal strength compatibility
     mobile services need signals in range ~ -90 to -25 dBm
    repacking to match coverage areas
          →enable some plan flexibility
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A Realizable Band Plan for 600 MHz

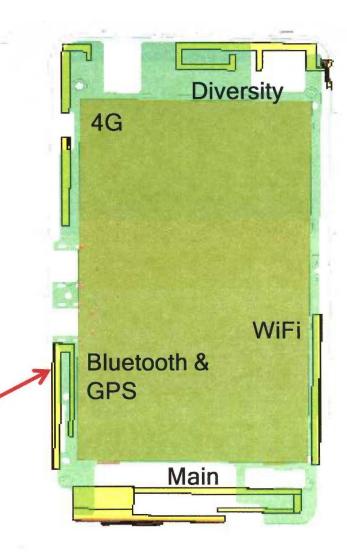




Antenna Design

Size constraints
Bandwidth
Efficiency
Number of antennas
Regulatory requirements

There are many antennas in the devices already



The 600 MHz frequencies add challenges to filters and duplexers

Size constraints of components

Performance

Band-pass filters

bandwidth

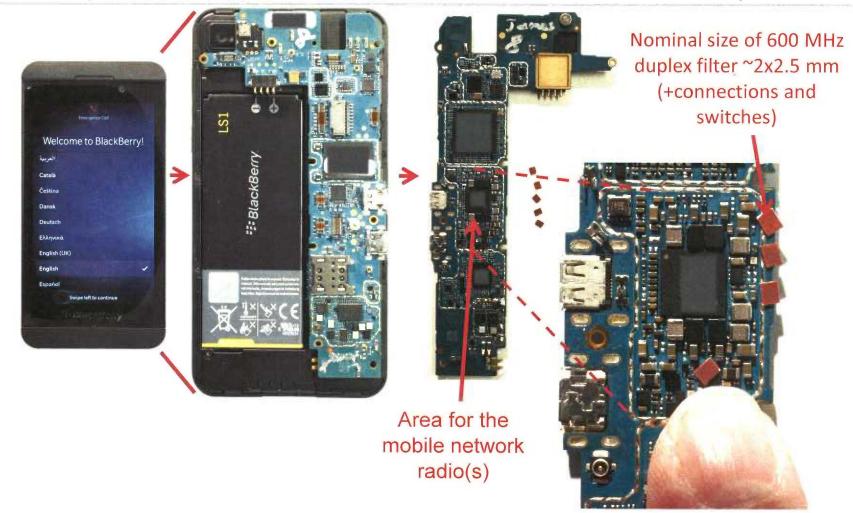
Duplexers

gap size

Number of filters/duplexers for fully flexible handset



BlackBerry® Q10 smartphone



Handset Constraints

It's not just the 600 MHz band

Mobile Network bands

Quad band LTE 2, 5, 4, 13,17 ** (700/850/1700/1900 MHz)
Quad band HSPA+ 1, 2, 4, 5/6 * (850/1700/1900/2100 MHz)
Quad band EDGE (850/900/1800/1900 MHz)

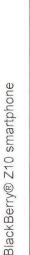
*Note: HSPA+ Band 4 (AWS) is carrier dependent *Note: LTE Band 13/17 is carrier dependent

Wi-Fi® (2.4 GHz / 5 GHz) 802.11 a/b/g/n

Bluetooth® (2.4 GHz) Bluetooth 4.0 Low Energy (LE)

GPS (1.57542, 1.2276 GHz, 1.598-1.605 GHz) Assisted, Autonomous and Simultaneous GPS GLONASS Support

NFC (13.56 MHz) communication between NFC-enabled devices







Harmonization

700 MHz serves as an example
Best opportunity to support competition and
healthy handset ecosystem
Critical if more bands are to be accomodated
7 IMT bands have over 30 band plans today